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Comments on Docket No. 92-235

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

I agree that a change in the rules for bands below 512MHz are needed. Here in the Los Angeles area the shared channels are becoming useless, not from over loading but from lack of the control of the users.

I feel that the only way to control these channels is by exclusive use by large users or communications suppliers (SMR Types). These operators will oversee the operation on these channels. Thus preventing unlicensed operation and putting some discipline in radio operations.

I agree with the majority of the proposed changes, but there are a few concerns. Under (Section E. Miscellaneous Proposals #26) We propose that current licensees that are licensed on a secondary basis be grandfathered and converted to new primary status on there existing channels. Thus solving the lack of channel space that forced them to the off set channels.

I recommend the implementation of stage 2 at the onset thus creating four channels from each now existing one and and it's off set. This would allow all existing users on main and 12.5Khz off sets to stay on there frequencies. It would then create two additional channels between them at 6.25Khz.

Start the channel assignments on an even frequency to make it easier for everyone to remember the frequency chanalization steps.

The original channels and 12.5Khz splits also should be converted to 6.25Khz Hi power channels with greatly reduced ERP and HAAT requirements of 200 Watts ERP. This is because most users on the 12.5Khz off sets are there because there were no high power channels available for them. This would provide them with the necessary channels they need and exclusive use if they have the needed loading.

The two newly created 6.25Khz channels between the old main and 12.5Khz channel should be used for reduced power operation of 10 watts or less. Thus forming new "improved" offset channels (See enclosed chart). The proposal for putting 2 watt offset channels 3.125Khz between the newly

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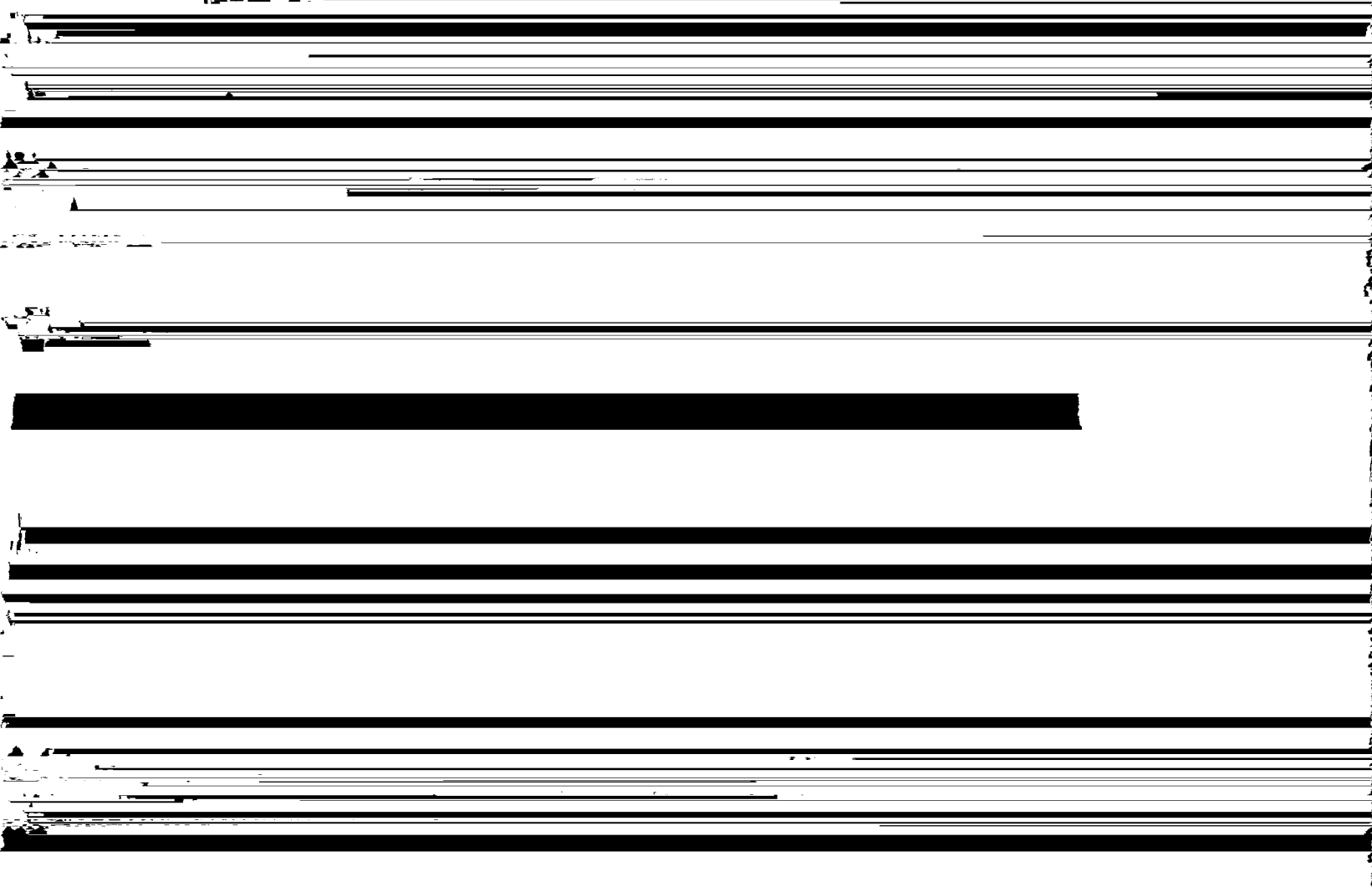
formed 6.25Khz channels will not work.

There should be some channels that do not need licensing or coordination. We recommend 151.625Mhz, 154.570Mhz and 154.600Mhz in the VHF range and 464.500Mhz, 464.550Mhz, 469.500Mhz and 469.550Mhz in the UHF band. These channels should be maintained as 12.5Khz channels for general use and provide a place for small users.

Paging channels should be maintained at there present 5Khz deviation mainly 152.480Mhz, 154.625Mhz, 157.740Mhz and 158.460Mhz.

I felt that the HAAT & ERP are of a major concern. This because in the Los Angeles area we have both flat-lands and mountains. The mountains also divide the land into independent areas. These mountains are not considered by the coordinators. System overlap can occur when one system is placed in the lowlands for local use and a co-channel system is placed on a nearby mountain.

Your proposed 50 mile clear area for exclusive use channels is good. However the next transmitter could be at



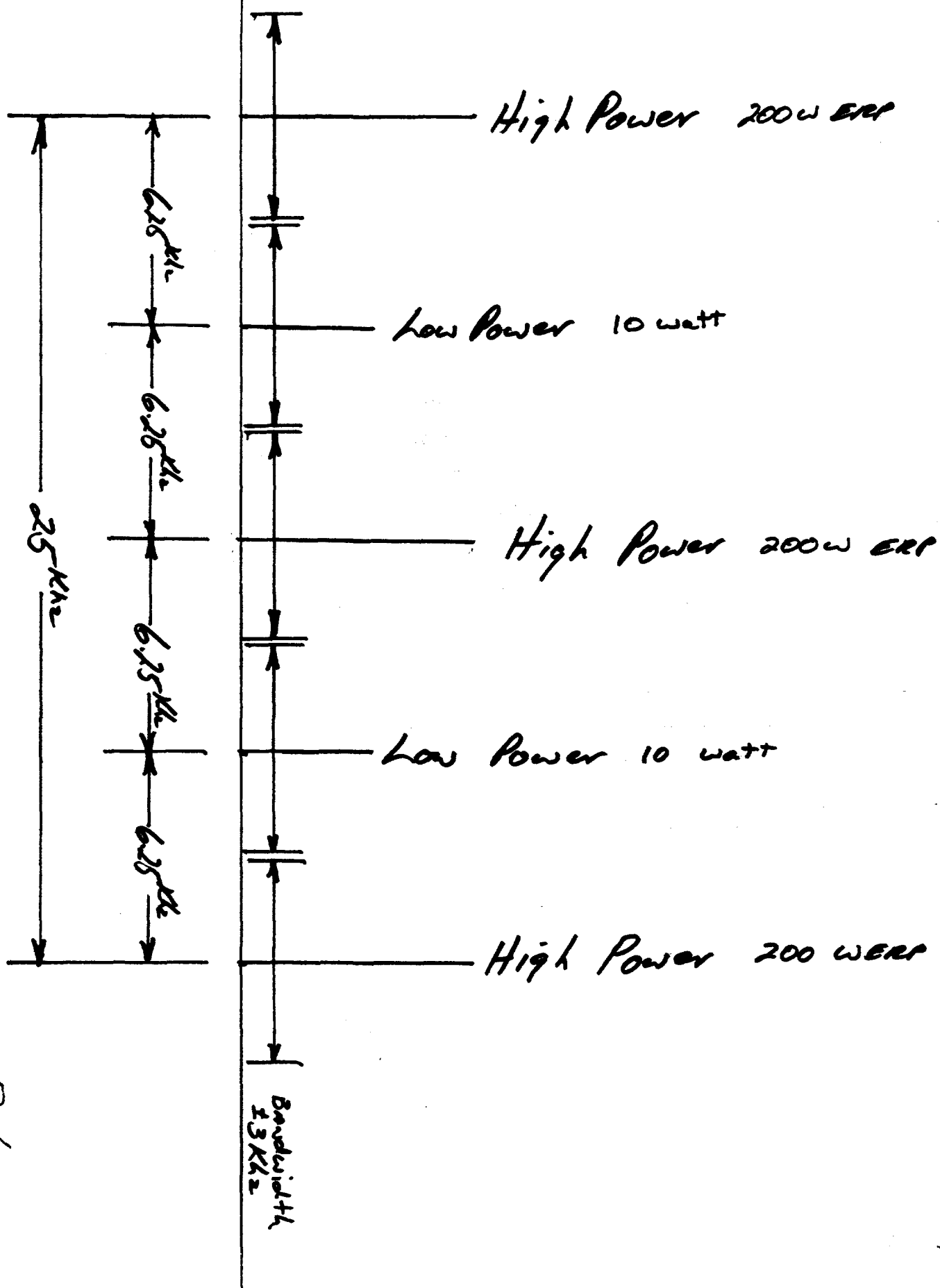


Fig 1